Section 1. Registration Information

Source Identification

Facility Name:	Apache Nitrogen Products, Inc.
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	27-Mar-2013
Postmark Date:	27-Mar-2013
Next Due Date:	27-Mar-2018
Completeness Check Date:	27-Mar-2013
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0007 5811
Other EPA Systems Facility ID:	85602PCHPWAPACH

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	8399263
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	1436 S. Apache Powder Road
Street 2:	9 miles Southeast of Benson
City:	St. David
State:	ARIZONA
ZIP:	85630
ZIP4:	6103
County:	COCHISE

Facility Latitude and Longitude

Latitude (decimal):	31.880500
Longitude (decimal):	-110.240500
Lat/Long Method:	Interpolation - Digital map source (TIGER)
Lat/Long Description:	Administrative Building
Horizontal Accuracy Measure:	100
Horizontal Reference Datum Name:	World Geodetic System of 1984
Source Map Scale Number:	

Owner or Operator

Operator Name:	Apache Nitrogen Products, Inc.
Operator Phone:	(520) 720-2217

Mailing Address

Operator Street 1:	P.O. Box 700
Operator Street 2:	
Operator City:	Benson
Operator State:	ARIZONA
Operator ZIP:	85602
Operator ZIP4:	0700
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Craig Boudle
RMP Title of Person or Position:	SH&E Manager
RMP E-mail Address:	CEBoudle@apachenitro.com

Emergency Contact

Emergency Contact Name:	Richard Coleman
Emergency Contact Title:	Operations Manager
Emergency Contact Phone:	(520) 975-9424
Emergency Contact 24-Hour Phone:	(520) 720-2150
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	Rcoleman@apachenitro.com

Other Points of Contact

Facility or Parent Company E-mail Address:	anpi@apachenitro.com
Facility Public Contact Phone:	(520) 720-2190
Facility or Parent Company WWW Homepage Address:	www.apachenitro.com

Local Emergency Planning Committee

LEPC:	Cochise County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	94
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	Yes
Air Operating Permit ID:	1000038

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	16-Jan-2013
Last Safety Inspection Performed By an External Agency:	USDOT and FRA

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	John Schaefer
Preparer Phone:	(865) 671-5854
Preparer Street 1:	ABS Consulting
Preparer Street 2:	10301 Technology Drive
Preparer City:	Knoxville
Preparer State:	TENNESSEE
Preparer ZIP:	37923
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000041089
Description:	Ammonium Nitrate Process
Process Chemical ID:	1000049313
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	5700000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000041089
Process NAICS ID:	1000041512
Program Level:	Program Level 3 process
NAICS Code:	325311
NAICS Description:	Nitrogenous Fertilizer Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000033898

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000035847

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp(TM)
Wind Speed (m/sec):	3.0
Atmospheric Stability Class:	D
Topography:	Urban

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

Nitric Acid Plant (AOP4)

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000042348
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7
Prevention Program Level 3 ID:	1000035862
NAICS Code:	325311

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	09-Nov-2011

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	09-Nov-2011

The Technique Used

What If:	
Checklist:	Yes
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	09-Nov-2013

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	
Floods (Flood Plain):	

Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	Yes
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	Yes
Emergency Air Supply:	Yes
Emergency Power:	Yes
Backup Pump:	Yes
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	Yes
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	Yes
Installation of Process Detection Systems:	

Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	12-Oct-2012

Training

Training Revision Date (The date of the most recent review or revision of training programs):	26-Feb-2013

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	Computer Modules

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	11-Jul-2012
Equipment Inspection Date (The date of the most recent equipment inspection or test):	24-Jan-2013
Equipment Tested (Equipment most recently inspected or tested):	Control Loop & Monitoring Calibration

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	15-Oct-2012
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	19-Jan-2012

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	29-Jun-2012

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	20-Oct-2011
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	20-Oct-2013

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	23-Jun-2011
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	15-Aug-2011

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	11-May-2012

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	29-Oct-2012

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	11-May-2012
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	29-Oct-2012

Confidential Business Information

CBI Claimed:	

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	10-Jun-2012

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	27-Feb-2013

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Cochise County Emergency Services
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(520) 432-9550

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	CERCLA Regulations at 40 CFR Parts 300-372

Executive Summary

1.0 INTRODUCTION

Apache Nitrogen Products, Inc. (ANPI) manufactures nitrogen-based chemical products for the mining and agricultural industries. ANPI (formerly the Apache Powder Company) has been manufacturing at its Cochise County facility since 1922. ANPI established a mission to be "best in its class" and recognizes that attaining that commitment means operating and maintaining its manufacturing process in a safe and responsible manner. To prevent accidental releases of hazardous substances, ANPI has developed and is implementing a comprehensive Risk Management Program (RMP) in accordance with Title 40 of the Code of Federal Regulations (CFR) Part 68. ANPI understands the risks associated with releases of hazardous substances and ensures that those risks are being well managed at its facility.

To help ensure the safety of its employees and the public as well as to protect the environment, ANPI's RMP is a combination of accidental release prevention programs and emergency planning programs. ANPI has already begun implementation of this program. This document provides a brief overview of the comprehensive risk management activities ANPI has developed and is implementing.

2.0 SOURCE AND PROCESS DESCRIPTION

ANPI manufactures nitrogen-based chemical products for the mining and agricultural industries. In simplest terms, ANPI converts anhydrous ammonia into various ammonium nitrate products. There is one manufacturing process at the ANPI facility consisting of six interconnected production units: 1) Ammonia Unloading and Storage Area, 2) Nitric Acid Plant AOP3, 3) Nitric Acid Plant AOP4, 4) Liquid Ammonium Nitrate (LAN) Plant, 5) Prilled Ammonium Nitrate Plant, and 6) Liquid Fertilizer Plant. ANPI has two support (i.e., non-production) units that are located apart from the manufacturing process: 7) Brine Concentrator and 8) Powerhouse. For the purposes of this Risk Management Plan, the Brine Concentrator and Powerhouse units are not part of the RMP covered process. Different safeguards apply to different units in the covered process, except for the Ammonia Unloading and Storage Area and Liquid Fertilizer Plant which share safeguards.

Anhydrous ammonia is the only regulated substance present at the ANPI facility in an amount equal to or greater than the "threshold quantity", as defined by 40 CFR Part 68. Anhydrous ammonia is imported to the ANPI facility by railcar. The railcars are unloaded into the Ammonia Unloading and Storage Area. Ammonia then enters into ANPI's Nitric Acid Plants (AOP3 and AOP4). The resulting acid feeds into the LAN Plant where it is reacted with more ammonia to produce LAN. The majority of the LAN is then pumped to the Prilled Ammonium Nitrate Plant where it is concentrated and converted from liquid to solid form. The remaining LAN is either sold directly to customers or converted into fertilizer solutions at the Liquid Fertilizer Plant. At the Liquid Fertilizer Plant, LAN is used to produce several liquid fertilizers to serve the seasonal needs of the agricultural industry.

3.0 SUMMARY OF MAJOR HAZARDS

The potential hazards associated with ANPI's manufacturing process are related to chemical releases, equipment failures, and process upsets. The nature of the hazard is related to the type of event or accident that could occur.

Relevant onsite or facility hazards associated with the production and support units are reported in this document on a unit-by-unit basis. Major onsite hazards include toxic release; fire; explosion; over pressurization; corrosion; overfilling; contamination; equipment failure; and/or loss of cooling, heating, electricity, or instrument air.

The relevant offsite hazard that could impact the local population and environment is also reported in this document. The major offsite hazard would arise from an accidental release of anhydrous ammonia gas resulting in a toxic vapor cloud. Whether a release of anhydrous ammonia poses a threat to health depends on the concentration of ammonia in the air and the duration of exposure. If individuals remain exposed to high concentrations of ammonia in air for long periods of time, any or all of the following health effects could occur: 1) eye contact: severe irritation, swelling, partial or full blindness; 2) skin contact: severe irritation, blisters; and 3) inhalation: difficulty breathing, lung damage, and death by suffocation.

4.0 EXPLANATION OF HOW RELEASES ARE PREVENTED

ANPI's RMP is designed to reduce the number and severity of potential hazardous substance releases. ANPI's risk to offsite

receptors near the ANPI facility. At the ANPI facility, the frequency and severity of a hazardous substance release is reduced through the implementation of effective prevention, management, mitigation, and emergency response (ER) measures.

4.1 Prevention Program Management System

ANPI's RMP reduces the likelihood of a hazardous substance release by implementing a prevention program. An organizational chart illustrating ANPI's prevention program management system is provided.

ANPI's prevention program elements are the same as the requirements for the Occupational Safety and Health Administration (OSHA) Process Safety Management (PSM) Standard (29 CFR 1910.119). ANPI has qualified employees trained in PSM and has established an organization to assure proper implementation of PSM within the RMP.

ANPI implements a set of twelve management areas designed to protect worker health and safety in the event of accidental releases. To address the hazards of a potential hazardous substance release, the following PSM steps are taken at the ANPI facility:

1. Employee Participation - ANPI consults with its employees on the development of process hazard analysis (PHA) and the development of the other elements of PSM. In addition, ANPI employees are provided access to all PSM information. ANPI has also prepared a written plan of action that describes how employee participation is implemented (ANPI Document No. PSM-0001).

2. Process Safety Information (PSI) - ANPI has established and implements a written program that addresses and controls written PSI on each production and support unit in the manufacturing process (ANPI Document No. PSM-0002). PSI was compiled with respect to the hazard of the chemicals used in the process, the technology of the process, and the equipment in the process. ANPI implements good engineering practices for the design, maintenance, inspection, testing, and operation of process equipment.

3. Process Hazard Analysis (PHA) - ANPI has established and implements a written program to identify, evaluate, and control the hazards for each production and support unit in the manufacturing process (ANPI Document No. PSM-0003). ANPI has performed eight PHAs. ANPI established the priority order and schedule for conducting the PHA, addressed the items to evaluate in the analyses, decided the make-up of the PHA team, and determined a system to resolve PHA findings and recommendations. ANPI retains the PHA record for the life of the manufacturing process.

4. Operating Procedures (OPs) - ANPI has developed and implements a written program that addresses and controls written OPs process (ANPI Document No. PSM-0004). OPs are consistent with the PSI for each production and support unit in the manufacturing process. OPs address the steps for each operating phase of the manufacturing process, the operating limits, certain safety and health considerations related to the process, and safety systems and their functions. OPs are readily accessible to ANPI employees, reviewed periodically for accuracy, and reviewed on an annual basis. ANPI has developed and implements safe work practices such as lockout/tagout, confined space entry, opening process equipment or piping, and control over entrance into the manufacturing area.

5. Training - ANPI has well trained employees. ANPI trains each employee involved in an operating process and trains each employee before operating a new process or transferring into a new unit (ANPI Document No. PSM-0005). PSM refresher training is provided at least every three years. Additional hazardous substance training is provided to ANPI employees under the HAZWOPER and Hazard Communication standards. Training is documented to record that each ANPI employee received and understood the training. ANPI employees are held accountable for safe operations.

6. Contractors - As part of its selection process, ANPI evaluates the safety performance and programs of ANPI contract employees in accordance with ANPI Document No. PSM-0006. ANPI informs contractors of process hazards and applicable parts of ANPI's Emergency Response Program (ERP). ANPI has developed and implements safe work practices to control contractor access to the manufacturing process areas. ANPI conducts periodic walk-through inspections to evaluate the safety performance of contractors. ANPI's policy is to hire qualified contractors who are trained to safely perform their jobs and who are knowledgeable in the hazards related to their jobs. The contractor's training is verified by ANPI. Safety rules are strictly enforced at the ANPI facility to ensure that contract employees follow safety rules. ANPI requires contractors to inform ANPI of any unique hazards presented by the contractor's work.

7. Pre-Startup Safety Review (PSSR) - When a modification requires a change in the PSI, ANPI performs a PSSR for new sources of hazardous substances (ANPI Document No. PSM-0007). The PSSR confirms that specific listed items are addressed before a hazardous substance is introduced into ANPI's manufacturing process.

8. Mechanical Integrity - One of the most important prevention program elements is to ensure mechanical integrity. Maintaining mechanical integrity is vital to preventing releases of anhydrous ammonia from the ANPI facility. ANPI has well maintained equipment. ANPI has developed a policy and implements procedures for maintaining mechanical integrity (ANPI Document No. PSM-0008). Mechanical integrity training is provided to ANPI maintenance employees.

The schedule of inspection and testing is consistent with manufacturers' recommendations and good engineering practices. Daily walk-through inspections are performed for each production and support unit at the ANPI facility. Inspections are conducted to find any unusual or increasing vibration, leaks, stress corrosion cracking, or other indications of potential failures. Scheduled replacement and preventive inspection and maintenance for pressure relief valves are performed. Scheduled inspection and calibration of liquid level, temperature, and pressure instruments, switches, and shutdown devices that have safety implications are performed. Scheduled inspections of major powered equipment such as compressors, pumps, large fans, bearings, couplings, shaft seals, and mountings are performed.

Also, process equipment is inspected and tested according to generally accepted good engineering practices and each inspection and test is documented. Any deficiencies in equipment that are outside acceptable limits are corrected in a timely manner. In addition, construction of new equipment is evaluated to ensure proper assembly and installation. Finally, maintenance materials and spare parts must be suitable for ANPI's manufacturing process.

9. Hot Work Permits - ANPI has established and implements a process that issues a hot work permit (i.e., safety checklist) for all hot work operations performed on or near a manufacturing process (ANPI Document No. PSM-0009). Hot work operations include welding, cutting, brazing, burning, grinding; using non-intrinsically safe electrical tools and instruments; working on electrical circuits; or using flame or spark producing devices. This permit (i.e., safety checklist) documents and ensures the implementation of fire prevention measures before beginning hot work.

10. Management of Change (MOC) - ANPI has established and implements written procedures to manage changes to process chemicals, technology, equipment and procedures, as well as changes to hazardous substances that affect ANPI's manufacturing process (ANPI Document No. PSM-0010). MOC procedures ensure that specific listed items are addressed prior to any change. Also, ANPI employees and/or contract employees affected by the change are informed of, and trained in, the change before start-up. If a change results in a change to the PSI or the OPs, these PSM elements are updated accordingly.

11. Incident Investigation - ANPI investigates each incident that resulted in, or could reasonably have resulted in, an accidental release of a hazardous substance (ANPI Document No. PSM-0011). An ANPI investigation team immediately initiates an incident investigation. The ANPI investigation team prepares an incident report and develops a system to address and resolve report findings and recommendations. In addition, the incident investigation report is reviewed with all affected ANPI personnel and the report is retained for five years.

12. Compliance Audit - At least every three years, ANPI evaluates compliance with the provisions of the PSM (ANPI Document No. PSM-0013). ANPI specifies the requirements for the audit team and the report. Response or corrective actions to compliance audit findings are implemented and documented.

4.2 Response Actions in the Event of a Release

In the event of accidental release of a hazardous substance that could have offsite consequences, ANPI response actions would include any or all of the following: employing mitigation measures, implementing the ER Plan, notifying the community, performing shelter-in-place, or evacuating the affected area(s).

4.2.1 Mitigation

Mitigation prevents or minimizes an accidental hazardous substance release. ANPI process controls and mitigation systems are reported in this document on a unit-by-unit basis. Process controls in use at the ANPI facility include: vents, relief valves, check

valves, scrubbers, manual shutoffs, automatic shutoffs, interlocks, alarms and procedures, keyed bypass, emergency air supply, backup pumps, grounding equipment, rupture disk, excess flow device, quench system, and purge system. Mitigation systems in use at the ANPI facility include: dikes, blast walls, deluge system, enclosure, neutralization, and containment pad.

4.2.2 Emergency Response Program (ERP)

In the event of a release, ANPI has a comprehensive ERP that is coordinated with the Cochise County Sheriff's Department (the local emergency planning committee [LEPC]). The purpose of the ANPI ERP is to prevent or minimize the impact to on-plant personnel, offsite populations, and the environment.

It is ANPI's policy to maintain a current and accurate written ER Plan for facility operations (ANPI ER Plan, February 1999; and ANPI Document No. PSM-0012). ANPI's ER Plan is updated on an annual basis as a minimum and is updated more often to reflect changes at the ANPI facility. ANPI employees are promptly informed of ER Plan changes. ANPI's ER Plan is all-inclusive and addresses a number of ER elements.

The ANPI facility is also included in the LEPC's written Community ER Plan. ANPI has developed a close working relationship with the LEPC to ensure that local authorities fully understand the ANPI facility risk and management systems. To better assist with ER, ANPI conveys accurate and up-to-date information about the facility to the LEPC. ANPI employees are also active members of the LEPC.

4.2.3 Emergency Response Training

ANPI has established an emergency notification system that utilizes a community-warning siren, Community Alert Network (CAN) telephone notification system, and, if needed, public radio announcements. In the event of a release, ANPI utilizes the CAN system to notify residences within a 1-mile radius of the ANPI anhydrous Ammonia Unloading and Storage Area.

4.2.5 Community Outreach Program

ANPI has worked with the LEPC to put in place a community outreach program. ANPI's community outreach program alerts and protects nearby residents in the event of an off-plant ammonia release. ANPI's community outreach program:
Presents the basic health hazards associated with ammonia
Explains how you will be notified in the event of an off-plant ammonia release
Details the shelter-in-place protection procedures
Provides general information on evacuation, fundamental first aid, decontamination measures, and special assistance needs.

5.0 FIVE-YEAR ACCIDENT HISTORY

In the past five years, there has not been an anhydrous ammonia release from the ANPI facility that meets the regulatory criteria for accident reporting under the RMP rule (40 CFR 68.42). ANPI has had no onsite deaths, injuries, or property damage as a result of an accidental release of anhydrous ammonia. There have been no offsite deaths, injuries, evacuations, shelter-in-place, property damage, or environmental damage as a result of an accidental release of anhydrous ammonia from the ANPI facility.

6.0 PLANNED CHANGES TO IMPROVE SAFETY

Apache Nitrogen maintains a continual improvement process to identify and implement process and/or procedural improvements to our safety program. Most recently, the Unusual Incident Report (UIR) has been developed and implemented. As the name implies, the UIR captures unconventional incidents, potentially outside the scope of regulation mandated incidents, which could have a detrimental impact on the safety of workers and/or the public. Participation in the UIR process is available to, and encouraged among, all Apache employees. All incidents captured by the UIR process are documented, reviewed, and addressed by Apache Nitrogen senior management.

7.0 CONCLUSION

At ANPI, the risk for hazardous substance release is taken seriously and all employees are accountable for safe operations. ANPI

has taken the appropriate steps to address the hazards associated with accidental hazardous substance releases. To continually improve safety at the ANPI facility, implementation of ANPI's RMP is an on-going process. As potential safety improvements are identified, these changes or enhancements are reviewed and implemented.

This Risk Management Plan summarizes ANPI's rigorous RMP. ANPI's comprehensive RMP consists of a prevention program that is managed in accordance with OSHA's PSM Standard. In the event of an accidental release of anhydrous ammonia, various ER actions may be employed including, but not limited to, the following: mitigation measures, ER Plan, community notification, shelter-in-place, or evacuation. ANPI's commitment to the RMP is a critical component in the mission to be "best in class."